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ENVIRONMENTAL REVIEW BRANCH
PLANNING & MANAGEMENT DIV.

JAN 26 1990

5HR-12

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Lieutenant Derek Jatho
Environmental Coordinator
U.S. Air Force
Scott Air Force Base
Belleville, Illinois 62225-5045

Re: Notice of Violation
Scott Air Force Base
IL7 570 024 177

Dear Lieutenant Jatho:

An inspection of the Scott Air Force Base was conducted on May 24, 1989, by representatives of the United States Environmental Protection Agency (U.S. EPA). The Illinois Environmental Protection Agency (IEPA) was notified of this inspection but did not participate. Under Executive Order 12088 of the Resource Conservation and Recovery Act (RCRA), Federal agencies have been given the primary responsibility for ensuring the compliance of Federal facilities under their jurisdiction.

The purpose of the inspection was to determine if the Scott Air Force Base was in compliance with the State equivalent requirements of Subtitle C of RCRA as amended, 42 U.S.C. §6901 et seq., including the Federal land disposal restrictions. The land disposal restrictions for F001-F005 waste solvents became effective on November 8, 1986, (reference 51 Federal Register 40636: revisions to 40 CFR Parts 260-265, 268, and 270-271) and for "California List" hazardous wastes on July 8, 1987, (reference 52 Federal Register 25760: revisions to 40 CFR Parts 262, 264, 265, 268, and 270-271). Additionally, the land disposal restrictions for First Third of Scheduled Wastes became effective on August 8, 1988, (53 Federal Register 31138: revisions to 40 CFR Parts 264, 265, 266, 268, and 271). The State requirements are found at 35 Ill. Adm. Code 720 et seq. A copy of the inspection report is enclosed for your information.

As a result of the RCRA inspection, the following violations have been identified:

1. 35 Ill. Adm. Code Part 722.134(a)(3) which requires that each container be clearly marked or labeled with the words "Hazardous Waste";

2. 35 Ill. Adm. Code Part 722.134(a)(2) which requires that the date upon which each period of accumulation begins is clearly marked and is visible for inspection on each container;
3. 35 Ill. Adm. Code Part 725.273 which requires all containers of hazardous waste be closed during storage and that containers of hazardous waste which are opened, are handled or stored in a manner which will prevent the rupture of the container and prevent the container from leaking;
4. 35 Ill. Adm. Code Part 725.274 which requires that areas where hazardous wastes are stored, be inspected at least weekly, identifying leaks and or deterioration caused by corrosion or other factors;
5. 35 Ill. Adm. Code Part 725.132(a), 725.132(b), 725.132(c) which requires that the facility be equipped with an internal communications or alarm system, a telephone capable of summoning emergency assistance from local police or fire and portable fire extinguishers, fire control equipment;
6. 35 Ill. Adm. Code Part 725.113(a)(1), 725.113(a)(2), and 725.113(a)(3) which requires that an owner or operator follow the procedures in a written waste analysis plan;
7. 35 Ill. Adm. Code Part 725.116(d) and 725.116(d)(2) which requires the facility to maintain complete records for the job title for each position related to the management of hazardous waste and the names of the employees filling each job and a written job description for each job position must also be maintained;
8. 35 Ill. Adm. Code Part 725.155(a) which requires that the facility maintains a Contingency Plan. The facility did have a contingency plan available however it needed to be reviewed and revised;
9. 35 Ill. Adm. Code Part 725.152(d) which requires that the Contingency Plan contains a list of emergency coordinators, phone numbers and addresses; and
10. 35 Ill. Adm. Code Part 725.117 which requires the owner or operator to take precautions to prevent accidental ignition or reaction of ignitable or reactive waste. At the time of inspection incompatible wastes were stored next to each other.

With respect to the land disposal restrictions section of the inspection, your facility was found to be in violation of the following:

1. Failure to determine the appropriate treatability group of the waste as required by Section 268.41;
2. Failure to determine whether the waste exceeds treatment standards as required by Section 268.7(a);

3. Failure to provide a separate written notice attached to the manifest for each shipment of restricted wastes with the U.S. EPA hazardous waste numbers, the applicable treatment standards, manifest number, and waste analysis data, where available, as required by Section 268.7(a)(1);
4. Failure to revise the waste analysis plan to include 40 CFR Part 268 requirements in accordance with Section 265.13;
5. Failure to maintain a complete operating record to include 40 CFR Part 268 requirements in accordance with Section 265.73; and
6. Failure to identify contents and mark dates on all containers entering storage, as required by Section 268.50(a)(2)(i).

You are hereby requested to submit within (30) days from the date of this letter a written description of the actions taken to correct the aforementioned violations. Failure to correct the violations may subject the facility to further Federal enforcement actions.

If you have any questions regarding this matter, please contact Ms. Janet Haff of my staff at (312) 353-7923.

Sincerely yours,

William E. Muno, Chief
RCRA Enforcement Branch

Enclosure

cc: Harry Chappel, IEPA
Glen Savage, IEPA

bcc: G. Golubski, 5SCDO
/ B. Franz, 5ME
Compliance File
J. Haff, 5HR-12